

# Comments relating to RM-11306

## By Robert W. Lewis, AA4PB

My concern, and the concern of many amateurs, with RM-11306 is that the bandwidth proposal eliminates the restrictions on stations under automatic control. Automatic control, even if the originating station is under the direct control of a control operator, is not compatible with the typical amateur operation which involves stations under manual control communicating with each other in real-time. In theory, the originating station would determine that the frequency is not in use before requesting the communications with the station under automatic control. In practice it has been shown that this station often does not hear the stations using the frequency due to propagation. He then triggers the station under automatic control which has propagation and causes severe interference to the stations already using the frequency. The stations using the frequency, typically with a different mode, have no recourse because there is no control operator to communicate with at the automatic station.

To make matters worse, the use of the proprietary Pactor II or III protocols prevents other users of the frequency from even determining the call sign of the interfering automatic station unless they purchase an expensive modem.

The proposal to divide the bands according to bandwidth would be a great benefit for Amateur Radio if appropriate restrictions are in place to limit the frequencies to which stations under automatic control have access. This should include all stations under automatic control, even if the initiating station is under manual control. A small portion of the 3.5KHz segment of each band could be allotted for stations under automatic control. Such stations would be permitted to use this segment regardless of bandwidth up to the 3.5KHz maximum. Considering that these stations represent a small portion of the total Amateur Radio population a small segment is justified. Considering that these stations are typically store and forward e-mail systems they do not normally require instant real-time access. It should be acceptable for stations to establish their connections in turn. Restricting stations under automatic control to these frequencies would protect users of manually controlled stations from being unduly interfered with by automatic stations that cannot tell that the frequency is in use.

Because of the proprietary protocol being used, stations under automatic control should be required to transmit their call sign using CW or MCW so that stations that do not have the expensive proprietary hardware can identify the automatic station.

It is recognized that there are special circumstances such as communications emergencies when such automatically controlled stations may need additional frequencies to handle heavy emergency traffic loads. Additional frequencies could be set aside for use by authorized ARES stations under automatic control only while participating in a declared emergency.

I hope that the FCC will give serious consideration to this aspect of RM-11306 and work with the ARRL and the Amateur community to make the appropriate changes before adoption of the proposal.